

IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF TEXAS
BEAUMONT DIVISION

TINA JOHNSON, §
§
Plaintiff, §
§
v. § CIVIL ACTION NO. 1:22-CV-00411
§
DAVID THOMAS HERBERT, et al., §
§
Defendants. §

**PLAINTIFF'S OBJECTIONS TO DEFENDANT AMAZON LOGISTICS, INC.'S
DEPOSITION DESIGNATIONS**

Plaintiff Tina Johnson files this Objections to Defendant Amazon Logistics, Inc.'s Deposition Designations and respectfully requests the following objections be sustained and the complained of testimony prohibited.

Plaintiff objects to the following items in Defendant Amazon's Deposition Designations:

TODD GOODHEART

Plaintiff objects to the use of any deposition testimony for purposes other than any properly established impeachment when the witness is present at trial or hasn't otherwise been established to be unavailable as that term is understood under the Federal Rules of Evidence and Civil Procedure.

DAVID HERBERT 2/1/22

Plaintiff objects to the use of any deposition testimony for purposes other than any properly established impeachment when the witness is present at trial or hasn't otherwise been established to be unavailable as that term is understood under the Federal Rules of Evidence and Civil Procedure.

DAVID HERBERT 9/6/23

Plaintiff objects to the use of any deposition testimony for purposes other than any properly established impeachment when the witness is present at trial or hasn't otherwise been established to be unavailable as that term is understood under the Federal Rules of Evidence and Civil Procedure.

BRIAN KENDRICK

Plaintiff objects to the use of any deposition testimony for purposes other than any properly established impeachment when the witness is present at trial or hasn't otherwise been established to be unavailable as that term is understood under the Federal Rules of Evidence and Civil Procedure.

TODD MALLETT

Plaintiff objects to the use of any deposition testimony for purposes other than any properly established impeachment when the witness is present at trial or hasn't otherwise been established to be unavailable as that term is understood under the Federal Rules of Evidence and Civil Procedure.

RYAN SANDEFUR

Plaintiff objects to the use of any deposition testimony for purposes other than any properly established impeachment when the witness is present at trial or hasn't otherwise been established

to be unavailable as that term is understood under the Federal Rules of Evidence and Civil Procedure.

Respectfully submitted,

PIERCE SKRABANEK, PLLC

/s/ *Kyle W. Chapel*
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ATTORNEYS FOR PLAINTIFF

CERTIFICATE OF SERVICE

I hereby certify that a true and correct copy of the foregoing instrument was served on all counsel of record, as listed below, on this 19th day of October, 2023, pursuant to the Federal Rules of Civil Procedure.

/s/ *Kyle Chapel*

KYLE W. CHAPEL